Project Review Comments	Type: DMMP Concept: Final: xx Other:	Page: 1 of 4 Date: 6/6/02
Project: UMR & IWW Restructured Navigation Study – Draft Interim Report **Location:**	**Reviewer:** **Name: Dan McGuiness** **Organization: Audubon**	

Comment Number	Drawing/ Number	Page/ Space	COMMENT	ACTION
1		12	**It is important to cite the entire 2.6 million acres of the floodplain as part of the system, which you have done.**	**Concur.**
2		15 1.4.2	**The second paragraph is confusing. The GREAT I and II studies were completed in 1980. The Master Plan was completed in 1982. Differentiate between their purposes and outcomes.**	**Concur.**
3		19 1.7.1 .4	**4th paragraph – The reasons for increased funding for environmental studies should be further explained. The formal UMRCC statement of November 1994, backed by certain NECC members raised serious concerns about the extent of environmental studies proposed in the PMP and afterward.**	**Noted.**
4		24 1.7.2 .1	**Cite the web site address where investigations can be reviewed.**	**Website address added.**
5		27 1.7.2 .4	**Who presented the Issue Papers to the Federal Principals Task Force?**	**Issue papers discussion revised. Issue papers were presented by the Regional Interagency Work Group.**
6		32 1.8.2	**We support looking at non-structural measures as immediate and/or long-term measures for improving capacity efficiency.**	**Noted.**
7		32 1.8.4	**November 2002 should be 2001?**	**Revised.**

8		34 1.8.5	**Consider developing three layers of pool-scale plans: ecosystem, navigation system and flood control system. Then using these three "layers" develop pool-scale integrated plans that are sustainable.**	**Goals and objectives for a sustainable environment will be more fully developed to a pool scale in the feasibility sturdy.**
9		36 2.2	**We strongly support the statement that "…the Interim Report is to outline an integrated plan to ensure the economic and environmental sustainability of the UMRS" but the statement should not end with "Navigation System" but should include "Ecosystem" as well.** **Audubon has received more than 730 individually signed postcards that include the text listed below. (These will be hand delivered to the Corps of Engineers on June 13th at the GLC meeting/conference call.) The post cards say: "Dear General Flowers: The Upper Mississippi River is a national treasure, declared by Congress in 1986 to be both a nationally significant ecosystem and navigation system. As you develop a Comprehensive Management Plan for the river, I stand with the National Audubon Society in urging you to establish a strong ecosystem restoration component in the plan. We hope that the Corps will recognize the millions of dollars riverfront communities are investing to make a clean and environmentally sustainable Upper Mississippi River the front door to their communities. We call on you to save and restore the Upper Mississippi River, a national treasure that people, birds, and wildlife call home."**	**The feasibility study will be clear on definition of navigation system and ecosystem. There is obviously an overlap. Goals and objectives will be developed from bluff to bluff. Those within the navigation system will be addressed in the nav. Study. Those outside its boundaries will be addressed in other studies, agencies, etc.** **Postcards have been delivered to LTG. Flowers.**

10		44 2.4.1	**More information about the post lock and dam construction conditions – when they changed – would be useful background. See the comments and text of the 1973 (draft) and 1974 (final) EIS for the O and M of the Nine-Foot Navigation Channel (St. Paul District, Corps of Engineers) for more background. The "honeymoon period" for the natural resources ended in the 1950s or 1960s.**	**Environmental historic and existing conditions were expanded in section 2.3.2.2 and later in section 2.3.1 the "honeymoon period" referenced were proposed as options for reference conditions.**
11		53 2.2.2 .2.4	**It would be useful to cite how many miles of levees exist in each reach.**	**The linear measure of levees will be determined in the UMRS Comprehensive Study for floodplain resources, data available for this study have not been verified for linear measurements.**
12		54 Table 5	**It is clear from this table that the refuge has secured a significant percent of the floodplain for public ownership and has kept a large percentage of floodplain unleveed relative to the rest of the UMRS. This contribution of the refuge should be noted.**	**The intent of the response is noted, the importance of public land was emphasized without specific references to the FWS Refuge System.**

13		2nd Par	**It would be good to state the precise amount of funding for EMP over the years to date and what percent of authorization is this?**	**The history of EMP and its contribution to the goals and objectives for a sustainable system will be included in the feasibility study. The feasibility study will be integrated with the report to Congress.**
14		61 Top of page	**In the Feasibility study, it would be Important to augment the text of environmental program titles with a matrix of what has been spent for each program for some period of time – compared to what has been spent for navigation and flood control for same period of time. (Use 1930 to present?)**	**The feasibility study will provide this history as a context, however the future needs of the system will be developed through the ongoing process of establishing goals and objectives.**
15		79 2.4.3 .4.	**Resource managers, in recent months, have made significant strides in defining resource needs and measures to address those needs. The UMRCC is working on detailed descriptions of measures and costs. This information would be very useful to incorporate and/or reference in the final interim report if it is available.**	**Noted, the UMRCC documents referenced in the final interim report.**

16		106 2.5.2	**We strongly support the statement that "Alternative plans will be a combination of measures formulated to meet the dual objectives of navigation efficiency and ecosystem restoration." But the parenthetical comments within the sentence may not be appropriate. The statement "(reduction of lock congestion)" is too narrow to define how navigation efficiency might be obtained. The statement "an environmentally sustainable system)" likewise does not acknowledge the need for going beyond sustaining what we have and expanding our efforts to restore, in some cases, conditions or processes that have been lost or degraded over time.**	**Noted. Reduction of lock congestion has been replaced with navigation efficiency. Ecosystem restoration is intended to be general term that captures actions needed to insure sustainability. These issuess will be further clarified and explained in the final feasibility report.**
17		111 – top of page	**Your examples of integrated alternatives show promise. We view the process of developing and evaluating integrated alternatives as one of the most important aspects of this effort. Integrating plans will be one of the most critical steps in the months ahead. The Interim Report should lay out the process and schedule as fully as possible for this aspect of the work yet to be done.**	**See revised section 3.**
18		121	**The diagram of system authorities is much too simple. The Corps should engage resource managers and navigation interests in developing a more useful conceptual diagram. The river management categories used in Appendix 2 might be a good place to start in developing the diagram, augmented by the work being done by the UMRCC.**	**Noted, we are currently engaging experts and mangers in a process to refine conceptual models to aid in the refinement of ecosystem objectives for specific locations in the river system.**

19		122	**Under the title "Floodplain Component" of Conclusion 1 you reference what will be done as part of the WRDA 99 Comprehensive Study. Will the WRDA 99 study be done in time to incorporate its findings within the final re-started navigation study report? It would appear that, until such is floodplain study information is available, an integrated plan that integrates navigation system, ecosystem and flood control system plans and programs cannot be completed.**	**The Comp. Study will be completing a recon. level effort concurrently with the Nav. Study. Goals and objectives from bluff to bluff will be developed in the nav. study. Implementation of these actions outside the navigation system will be addressed by other studies or efforts. For example the Comp Study will look at ecosystem restoration actions related to flood damage reduction. See Sec. 1.6.4.**
20		123	**Conclusion and Recommendation 2, although general in nature, is one we support, particularly the call for "a comprehensive synergistic plan."**	**Noted. The conclusions and recommendations section has been reformatted into a Feasibility Study Completion Strategy. See Sec 3.**

22		123	**Conclusion and Recommendation 3, although general in nature, is one we support. It is clear that existing institutional arrangements are not able or willing to address the broad spectrum or resource management needs, authorities and funding. In the final report, the need to extend this thinking to include basin-scale sediment and nutrient management should be considered.**	**Noted. The conclusions and recommendations section has been reformatted into a Feasibility Study Completion Strategy. See Sec 3. Discussions on institutional arrangements will be dependent on the recommended plan.**
23		123	**Conclusion and Recommendation 4, although vague at this point, is a concept we support. Adaptive management should apply to floodplain and navigation management as well as ecosystem management.**	**Noted. The conclusions and recommendations section has been reformatted into a Feasibility Study Completion Strategy. See Sec 3.7.**
24		123-124	**Conclusion and Recommendation 5, although somewhat general, is an idea we can support. We are particularly interested in exploring the use of a Federal Trust Fund to provide one of probably several means of funding the implementation of an integrated management plan.**	**Noted. The conclusions and recommendations section has been reformatted into a Feasibility Study Completion Strategy. See Sec 3.3.**
25		124	**Conclusion and Recommendation 6 is too vague, although its intent is a concept we support. A checkpoint conference should be held with stakeholders, particularly state and non-governmental stakeholders, to evaluate the current collaborative process and, if needed, look at ways to improve its value and effectiveness. Collaboration will be key to developing an integrated plan that has broad support.**	**Concur. Checkpoint conference will be scheduled early in 2003.**

26		124	**Conclusion and Recommendation 7 needs additional work. The statement within the Recommendation that says, "The feasibility study should ensure that the waterway system continues to be a nationally treasured ecological resource as well as an effective transportation system…" needs to be changed. It is not the waterway system that is a nationally treasured ecological resource. Change "waterway system" to "Upper Mississippi River System." We would suggest, in the recommendation, changing "Reduce lock congestion" to "improve navigation system efficiency" so as not to limit management options to simply address lock congestion issues.**	**Noted. This conclusion/recom-mendation has been deleted. The conclusions and recommendations section has been reformatted into a Feasibility Study Completion Strategy. See Sec 3.**
27		124	**Conclusion and Recommendation 8 seems to be a step in the Conclusion and Recommendation 1 and should be described within the framework of Conclusion and Recommendation 1 language.**	**Noted. This section has been deleted from Sec 3. This work is currently ongoing.**
28		124-125	**Conclusion and Recommendation 9, while general, is one we support. It is clear that the writers did not finish the descriptive language. Please clarify if the "Report to Congress" mentioned in this Recommendation will be done in time to incorporate the results in the feasibility study. When will the Report to Congress be done? How can the results of this study process inform the Report to Congress and vice-versa?**	**The scope of the EMP report to Congress will be fully integrated with the navigation study. The report to congress is scheduled for completion in 2004 also.**
29		125	**Conclusion and Recommendation 10 needs to be described with more clarity for the average reader, including the Members of Congress. Navigation models were one of the key issues of dispute before this study was halted. This Interim Report should clearly define how the modeling being done in this process differs from what was done in the previous version of the navigation study.**	**Noted. This section has been revised. See Sec. 3.6.**
30		125	**Conclusion and Recommendation 11 is not complete. The environmental costs and benefits of the existing system should be included and explained as well within this Conclusion and Recommendation, to pave the way for ongoing integrated planning and implementation of the Upper Mississippi River System.**	**Noted. This section has been deleted from the final interim report.**

31		General Comment	**Conspicuously absent from this document is a map and description of the Upper Mississippi River Basin. Since reference is made later to the need for water quality and sediment reduction and land use issues, a map of the basin seems essential.**	**Noted, we will include basin considerations with a revised conceptual model in the final report.**
32		General Comment	**It is clear that the document, while addressing ecosystem needs, remains more definitive in terms of defining navigation system needs that it does ecosystem needs. Will navigation needs and ecosystem needs be linked in the planning, evaluation, implementation and funding processes or does the Corps intend to shape a set of well-crafted recommendations for navigation, wrapped in vague ecosystem management language? Such a report would not be a truly integrated approach and one Audubon would not be able to support. As we have so often said, "this is a golden opportunity" to get it right. Agencies, stakeholders and Congress are entitled to our best advice and most comprehensive view of the basin and rivers system and how best to manage it in the future.**	**The formulation of alternatives will include both navigation improvement and ecosystem measures. The level of refinement of navigation needs vs. environmental needs reflects the large effort on Nav System issues in the earlier phase of the project compared to the relatively short time ecosystem needs have been include.**
33		General Comment	**Where do the U.S. Fish and Wildlife Service Coordination Act Report and the comments included therein, fit within the Interim Report and the current planning process. We did not see any mention of this.**	**The initial FWCA Report was referenced more clearly in the final interim report. The information on refuge land and environmental management spending came from that report.**
34		General Comment	**There is still virtually no clarity about "Where we go from here" in the draft Interim Report. It should spell out next steps and some kind of timeline. It leaves the reader with little understanding of what will happen next.**	**See Revised Sec 3.**

35		General Comment	**To what extent will the next steps fulfill the requirements of the National Environmental Policy Act? There was little if any discussion of this issue in the report or how it will be addressed in the remaining steps in this study.**	**The Feasibility Study and Programmatic Environmental Impact Statement will be prepared in full compliance with NEPA.**